

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**(1) KEVIN GRANT MCMILLAN,**  
[DOB 11/04/1986]

**(2) AMBER MARIE BAILEY,**  
[DOB 07/05/1984]

**(3) CHRISTINE MARIE ROSSITER,**  
[DOB 07/31/1986]

**(4) ANGELA MARIE BROWN**  
[08/18/1983],

and

**(5) CASIE DEE RICE**  
[07/09/1970]

Defendants.

Defendant 1: Counts 1, 2, 5, and 9  
Defendant 2: Counts 1, 3, 6, and 10  
Defendant 3: Counts 1, 4, 7, and 11  
Defendant 4: Counts 1, 8, and 12  
Defendant 5: Counts 1 and 13

**No. 20-3129-01/05-CR-S-SRB**

**COUNT 1**

18 U.S.C. § 2252A(g)  
NLT 20 Years Imprisonment  
NMT Life Imprisonment  
NMT \$250,000 Fine  
NLT 5 Years or Life Supervised Release  
Class A Felony

**COUNTS 2-4**

18 U.S.C. § 2251(a) & (e)  
NLT 15 Years Imprisonment  
NMT 30 Years Imprisonment  
NMT \$250,000 Fine  
NLT 5 Years or Life Supervised Release  
Class B Felony

**COUNTS 5-8**

18 U.S.C. § 2422(b)  
NLT 10 Years Imprisonment  
NMT Life Imprisonment  
NMT \$250,000 Fine  
NLT 5 Years or Life Supervised Release  
Class A Felony

**COUNTS 9-13**

18 U.S.C. § 2252(a)(2) & (b)(1)  
NLT 5 Years Imprisonment  
NMT 20 Years Imprisonment  
NMT \$250,000 Fine  
NLT 5 Years or Life Supervised Release  
Class C Felony

**Restitution**

\$100 Special Assessment each count  
\$5,000.00 JVT A Special Assessment

## **INDICTMENT**

### **THE GRAND JURY CHARGES THAT:**

#### **COUNT 1**

Beginning on an unknown date, but as early as January 1, 2017, and continuing through November 6, 2019, said dates being approximate, in Greene County, and elsewhere, in the Western District of Missouri, the defendants, **KEVIN GRANT MCMILLAN, AMBER MARIE BALEY, CHRISTINE MARIE ROSSITER, ANGELA MARIE BROWN, and CASIE DEE RICE**, did knowingly engage in a child exploitation enterprise, that is, the defendants violated Chapter 110 of Title 18 of the United States Code, as part of a series of felony violations constituting three or more separate incidents and involving more than one minor victim, to wit: the offenses set for in Counts 2, 3, 4, 9, 10, 11, 12, and 13 of this Indictment, incorporated herein, and committed those offenses in concert with three or more persons, all in violation of Title 18, United States Code, Section 2252A(g).

#### **COUNT 2**

Beginning on an unknown date, but as early as January 1, 2017, and continuing through November 6, 2019, said dates being approximate, in Greene County, and elsewhere, in the Western District of Missouri, the defendant, **KEVIN GRANT MCMILLAN**, employed, used, persuaded, induced, enticed, and coerced a minor, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, all in violation of Title 18, United States Code, Section 2251(a) and (e).

### **COUNT 3**

Beginning on an unknown date, but as early as January 1, 2018, and continuing through November 6, 2019, said dates being approximate, in Greene County, and elsewhere, in the Western District of Missouri, the defendant, **AMBER MARIE BALEY**, employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, all in violation of Title 18, United States Code, Section 2251(a) and (e).

### **COUNT 4**

Beginning on an unknown date, but as early as January 1, 2018, and continuing through May 1, 2019, said dates being approximate, in Greene County, and elsewhere, in the Western District of Missouri, the defendant, **CHRISTINE MARIE ROSSITER**, employed, used, persuaded, induced, enticed, and coerced a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, all in violation of Title 18, United States Code, Section 2251(a) and (e).

### **COUNT 5**

Beginning on an unknown date, but as early as January 1, 2017, and continuing through November 6, 2019, said dates being approximate, in Greene County, and elsewhere, in the Western District of Missouri, the defendant, **KEVIN GRANT MCMILLAN**, used a facility and means of interstate commerce, that is the internet and the cellular telephone network, to knowingly attempt to persuade, induce, and entice, a minor, an individual whom they believed to be less than eighteen

years of age, to engage in sexual activity for which a person can be criminally charged under the laws of the State of Missouri, all in violation of Title 18, United States Code, Section 2422(b).

#### **COUNT 6**

Beginning on an unknown date, but as early as January 1, 2018, and continuing through November 6, 2019, said dates being approximate, in Greene County, and elsewhere, in the Western District of Missouri, the defendant, **AMBER MARIE BALEY**, used a facility and means of interstate commerce, that is the internet and the cellular telephone network, to knowingly attempt to persuade, induce, and entice, a minor, an individual whom they believed to be less than eighteen years of age, to engage in sexual activity for which a person can be criminally charged under the laws of the State of Missouri, all in violation of Title 18, United States Code, Section 2422(b).

#### **COUNT 7**

Beginning on an unknown date, but as early as January 1, 2018, and continuing through May 1, 2019, said dates being approximate, in Greene County, and elsewhere, in the Western District of Missouri, the defendant, **CHRISTINE MARIE ROSSITER**, used a facility and means of interstate commerce, that is the internet and the cellular telephone network, to knowingly attempt to persuade, induce, and entice, a minor, an individual whom they believed to be less than eighteen years of age, to engage in sexual activity for which a person can be criminally charged under the laws of the State of Missouri, all in violation of Title 18, United States Code, Section 2422(b).

#### **COUNT 8**

Beginning on an unknown date, but as early as January 1, 2017, and continuing through May 1, 2019, said dates being approximate, in Greene County, and elsewhere, in the Western

District of Missouri, the defendant, **ANGELA MARIE BROWN**, used a facility and means of interstate commerce, that is the internet and the cellular telephone network, to knowingly attempt to persuade, induce, and entice, a minor, an individual whom they believed to be less than eighteen years of age, to engage in sexual activity for which a person can be criminally charged under the laws of the State of Missouri, all in violation of Title 18, United States Code, Section 2422(b).

#### **COUNT 9**

Beginning on an unknown date, but as early as January 1, 2017, and continuing through November 6, 2019, said dates being approximate, in Greene County, and elsewhere, in the Western District of Missouri, **KEVIN GRANT MCMILLAN**, the defendant, knowingly received and distributed any visual depiction that had been mailed and shipped and transported in interstate commerce, and which contains materials which had been so mailed and shipped and transported by any means, including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct and which visual depiction was of such conduct, all in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

#### **COUNT 10**

Beginning on an unknown date, but as early as January 1, 2018, and continuing through November 6, 2019, said dates being approximate, in Greene County, and elsewhere, in the Western District of Missouri, **AMBER MARIE BALEY**, the defendant, knowingly received and distributed any visual depiction that had been mailed and shipped and transported in interstate commerce, and which contains materials which had been so mailed and shipped and transported by any means, including by computer, the production of which involved the use of a minor

engaging in sexually explicit conduct and which visual depiction was of such conduct, all in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

#### **COUNT 11**

Beginning on an unknown date, but as early as January 1, 2018, and continuing through May 1, 2019, said dates being approximate, in Greene County, and elsewhere, in the Western District of Missouri, **CHRISTINE MARIE ROSSITER**, the defendant, knowingly received and distributed any visual depiction that had been mailed and shipped and transported in interstate commerce, and which contains materials which had been so mailed and shipped and transported by any means, including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct and which visual depiction was of such conduct, all in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

#### **COUNT 12**

Beginning on an unknown date, but as early as January 1, 2017, and continuing through May 1, 2019, said dates being approximate, in Greene County, and elsewhere, in the Western District of Missouri, **ANGELA MARIE BROWN**, the defendant, knowingly received and distributed any visual depiction that had been mailed and shipped and transported in interstate commerce, and which contains materials which had been so mailed and shipped and transported by any means, including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct and which visual depiction was of such conduct, all in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

**COUNT 13**

Beginning on an unknown date, but as early as March 1, 2019, and continuing through November 8, 2019, said dates being approximate, in Greene County, and elsewhere, in the Western District of Missouri, **CASIE DEE RICE**, the defendant, knowingly received and distributed any visual depiction that had been mailed and shipped and transported in interstate commerce, and which contains materials which had been so mailed and shipped and transported by any means, including by computer, the production of which involved the use of a minor engaging in sexually explicit conduct and which visual depiction was of such conduct, all in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

**A TRUE BILL**

/s/ Kevin Elliott

FOREPERSON OF THE GRAND JURY

/s/ Ami Miller

**AMI HARSHAD MILLER #57711**

Assistant United States Attorney

DATED: 11/17/20

Springfield, Missouri